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6 JORGE FRANCO-IBARRA

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 * * *

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 JORGE FRANCO-IBARRA
15 Defendant.

2:14-cr-173-JCM-PAL

STIPULATION TO CONTINUE
SENTENCING HEARING
(Second Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
17 States Attorney, and Robert A. Bork, Assistant United States Attorney, counsel for the United States
18 of America, and Rene L. Valladares, Federal Public Defender, and MONIQUE KIRTLEY, Assistant
19 Federal Public Defender, counsel for JORGE FRANCO-IBARRA that the sentencing hearing
20 scheduled on Thursday, May 14, 2015 at 10:00 a.m., be vacated and be continued to a date and time
21 convenient to the Court, but no earlier than twenty-one (21) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is in custody but does not oppose a continuance.
24 2. Mr. Franco-Ibarra would like additional time to provide the court with letters of
25 support from his family. Undersigned counsel will need additional time to receive, translate and
26 present letters of support for the defendant from his family in Mexico.

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1 4. This is the second request for a continuance of the sentencing hearing.

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3 DATED: February 26, 2015

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5 RENE L. VALLADARES
6 Federal Public Defender

DANIEL G. BOGDEN,
United States Attorney

7
8 By: /s/ Monique Kirtley
9 MONIQUE KIRTLEY,
Assistant Federal Public Defender

By: /s/ Robert A. Bork
ROBERT A. BORK,
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:14-cr-173-JCM-PAL

Plaintiff,

ORDER

vs.

JORGE FRANCO-IBARRA

Defendant.

ORDER

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy sentencing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, title 18, United States Code, § 3161 (h)(7)(A), when the considering the facts under Title 18, United States Code, §§ 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

IT IS THEREFORE ORDERED that the Sentencing currently scheduled for Thursday, May 14, 2015 at 10:00 a.m., be vacated and continued to June 10, 2015 at the hour of 10:00 a.m..

DATED May 13, 2015.


UNITED STATES DISTRICT JUDGE